

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA** )  
                                  )  
                                  )  
v.                              )      **Criminal No. 04-10194-RCL**  
                                  )  
                                  )  
**ANTHONY BUCCI, et al.**     )  
                                  )  
**Defendants.**                )

**JOINT MOTION FOR EXCLUSION OF TIME  
UNDER SPEEDY TRIAL ACT**

In accordance with the Court's request at the Interim Status Conference held on November 29, 2004, the United States of America and the defendants, by and through their respective counsel, hereby submit this joint motion for the exclusion of time under the Speedy Trial Act.

With the exception of a nine day period between July 6, 2004, and July 14, 2004, the Court has excluded from the Speedy Trial Act calculation all time from the date of the Indictment through August 24, 2004. Since that time the defendants have filed motions seeking to revise the terms of their pre-trial release (Bucci, Muolo and Jordan), have sought new counsel (Bucci and Muolo), and requested additional time to review the discovery provided by the United States and to prepare motions (Bucci, Muolo and Jordan). Moreover, each defendant has pending before the Court a motion to revise the terms of his pre-trial release. As a result, the parties agree that it is in the interests of justice to exclude from the Speedy Trial Act calculation the period from August 24, 2004, through the next interim status date on December 14, 2004, and

therefore request the Court to so exclude the time pursuant to 18 U.S.C. § 3161(h).

Respectfully Submitted,

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/s/ John T. McNeil for  
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/s/ John T. McNeil for  
KEVIN L. BARRON  
Counsel for Defendant MUOLO

Dated: December 6, 2004